

Division VIII of Title 5 of the California Code of Regulations

Proposed Addition of 5 California Code of Regulations §80033 Pertaining to Intern Teaching Credentials

Final Statement of Reasons

Public Problem

There is no change to the public problem information since the original submission of the Initial Statement of Reasons.

Purpose of Proposed Action

There is no change from the original purpose of the proposed action in the Initial Statement of Reasons.

Rationale for Proposed Regulations

At the request of the Office of Administrative Law (OAL), a Supplement to the Initial Statement of Reasons was distributed in a 15-Day Notice and posted to the Commission's website to provide the following additional rationale pertaining to the proposed addition of 5 California Code of Regulations (CCR) §80033 for the identified subsections:

(b)(1): The terms "Commission approved program sponsor" and "California employing agency" as used in this proposed subsection are terms that have meanings generally familiar to those directly affected. Service on an intern teaching credential is restricted to the California employing agency identified by the recommending program sponsor. The Commission issues Short-Term Staff Permits, Provisional Internship Permits, and emergency permits that are also restricted to service in a California employing agency. Definitions for "employing agency" are provided in the Title 5 sections that pertain to the issuance of the aforementioned permits as follows:

§80021(f)(1)(A) through (E) as related to the issuance of Multiple Subject, Single Subject or Education Specialist Short-Term Staff Permits

§80021.1(f)(1)(A) through (E) as related to the issuance of Multiple Subject, Single Subject or Education Specialist Provisional Internship Permits

§80023.1(b)(1) through (5) as related to the General Provisions Governing Emergency Permits

Intern programs are joint programs of California employing agencies and approved program sponsors [reference Education Code (EC) §44321] and require ongoing collaboration to ensure effective operation of the program. It is important that the partners ensure that the program is operating in a manner to further the educational goals of the district and meet the goals and purposes of the preparation program.

The Memorandum of Understanding referenced in the proposed language is necessary to ensure that the responsibilities of the California employing agency and the approved program sponsor are clearly defined as related to the support/mentoring and supervision that will be provided to individuals employed on intern teaching credentials. Support/mentoring is provided by the

California employing agency [reference EC §44465 for university interns and §§44326(d) and 44830.3(a) for district interns]. Supervision is provided by the approved program sponsor [reference EC §44461 for university interns and §§44326(d) and 44830.3(a) for district interns]. The Memorandum of Understanding must clearly define how, when, and by whom the support/mentoring and supervision will be provided to intern teachers.

(b)(3): The support/mentoring of intern teachers by the California employing agency is a vital component of an intern program since they are teachers in training. With this in mind, the Commission established possession of a valid, corresponding life or clear credential and three years of successful teaching experience as the minimum requirements for a mentor teacher. Possession of a life or clear credential indicates that the holder has achieved the highest level of credential available and educators with three years of successful teaching experience are more likely to be effective mentors.

It is anticipated that the majority of educators assigned by California employers to support/mentor intern teachers will hold teaching credentials issued by the Commission on Teacher Credentialing. However, the language proposed in this subsection does not state that the “valid, corresponding life or clear teaching credential” must be issued by the Commission on Teacher Credentialing. Intern program sponsors and employers will determine the exact type of teaching credential that must be held by a mentor teacher in the Memorandum of Understanding referenced in subsection (b)(1), including the potential acceptance of valid, corresponding life or clear teaching credentials issued by other states. The Commission adopted the proposed regulations with the understanding that “valid, corresponding life or clear teaching credential” could be broadly interpreted to include out-of-state teaching credentials if agreed upon in the Memorandum of Understanding developed between the intern program sponsor and the employer.

(b)(5)(B): Consensus was reached between stakeholders and the Commission that the educator providing support/mentoring to an intern teacher who enters an intern program without an English learner authorization must possess an English learner authorization to ensure he/she has the competencies to be an effective mentor. Additionally, the Commission determined that the support/mentor teacher identified pursuant to this subsection must be immediately available to assist the intern teacher with the instruction of English learners. The support/mentoring provided pursuant to subsection (b)(4) may possibly occur only at established weekly meetings, but intern teachers serving English learners need access to immediate support/mentoring to ensure effective daily instruction. “Immediately available” as used in this subsection may be interpreted to mean an educator the intern teacher may contact and receive support/mentoring from in the same school day. The identified support/mentor teacher may be assigned to the same school site or be available via telephone or email.

(b)(5)(C): The CTEL examinations referenced in this subsection are required for issuance of a Crosscultural, Language and Academic Development (CLAD) Certificate or English Learner Authorization (ELA) pursuant to 5 CCR §80015. The authorization of a CLAD Certificate/ELA exceeds the intern teaching credential English learner authorization proposed in subsection (g)(2)(D) for university interns and subsection (g)(3)(D) for district interns. However, an intern teaching credential is not an acceptable prerequisite credential for issuance of a CLAD Certificate/ELA as specified in 5 CCR §80015.2.

Since intern teachers who pass the CTEL have verified they possess the knowledge, skills, and abilities for a CLAD Certificate/ELA and since the authorization of a CLAD Certificate/ELA exceeds that of an intern teaching credential, the language of this subsection allows the intern teacher to be exempted from the additional support/mentoring and supervision related to the instruction of English learners.

(c)(4)(A): Completion of a Multiple Subject intern program leads to the issuance of a Preliminary Multiple Subject Teaching Credential. The subject-matter knowledge requirement for an intern teaching credential [reference EC §44453 for university interns and §44325(c)(3) for district interns] is the same as the subject-matter knowledge requirement for a preliminary teaching credential [reference EC §44259(b)(5)]. The subject-matter knowledge requirement for Preliminary Multiple Subject Teaching Credentials is defined in 5 CCR §80413(a)(5)(A). Rather than duplicate the subject-matter knowledge language in this subsection, the proposed language provides a cross-reference to the subject-matter knowledge definition previously established for Preliminary Multiple Subject Teaching Credentials.

(c)(4)(B): Completion of a Single Subject intern program leads to the issuance of a Preliminary Single Subject Teaching Credential. The subject-matter knowledge requirement for an intern teaching credential [reference EC §44453 for university interns and §44325(c)(3) for district interns] is the same as the subject-matter knowledge requirement for a preliminary teaching credential [reference EC §44259(b)(5)]. The subject-matter knowledge requirement for Preliminary Single Subject Teaching Credentials is defined in 5 CCR §80413(a)(5)(B). Rather than duplicate the subject-matter knowledge language in this subsection, the proposed language provides a cross-reference to the subject-matter knowledge definition previously established for Preliminary Single Subject Teaching Credentials.

(c)(4)(C): Completion of an Education Specialist intern program leads to the issuance of a Preliminary Education Specialist Instruction Credential. The subject-matter knowledge requirement for issuance of Education Specialist intern credentials is specified in EC §44453 for university interns and EC §44325(c)(3) for district interns. However, EC §44265 pertaining to the issuance of Education Specialist Instruction Credentials is not as specific as EC §44259 pertaining to the requirements for general education teaching credentials. The subject-matter knowledge requirement for Preliminary Education Specialist Instruction Credentials as previously defined by the Commission is provided 5 CCR §80048.8(a)(4). Rather than duplicate the subject-matter knowledge language in this subsection, the proposed language provides a cross-reference to the subject-matter knowledge definition previously established for Preliminary Education Specialist Instruction Credentials.

(c)(6): Each intern program includes a preservice component that provides a potential intern teacher with required skills and knowledge prior to entering the classroom as the teacher of record. Information pertaining to the preservice requirement is provided in the program standard documents incorporated by reference in (c)(5) as follows:

Multiple/Single Subject programs: Precondition (13)(A) on page 7 provides a definition of the preservice preparation requirement and the last paragraph on page 11 identifies the specific standards that must be addressed during preservice. Additional information related to the identified standards is provided in the respective sections of the approved program standards at <http://www.ctc.ca.gov/educator-prep/standards/AdoptedPreparationStandards-2013.pdf>.

Education Specialist programs: Precondition (17)(b) on page 5 provides a definition of the preservice preparation requirement and the third paragraph on page 15 identifies the specific standards that must be addressed during preservice. Additional information related to the identified standards is provided in the respective sections of the approved program standards at <http://www.ctc.ca.gov/educator-prep/standards/Special-Education-Standards-2013.pdf>.

(c)(7): An application form (reference 5 CCR §80433), processing fee (reference EC §44235), and fingerprint information (reference EC §44340) are required for each credential issued by the Commission. The language proposed in this subsection specifies the aforementioned requirements for issuance of university and district intern teaching credentials and references the relevant 5 CCR sections that define each requirement.

(c)(8): University and district intern programs require accreditation by the Committee on Accreditation [reference EC §44373(c)] and approval by the Commission (reference EC §44321). In addition, Commission approved programs are required to “...approve and electronically submit applications to the commission.” [reference EC §44227(b)] This practice of approving and electronically submitting an application is commonly referred to as a “recommendation,” which is a term that has a meaning generally familiar to those directly affected. The proposed language in this subsection clarifies that recommendation from a Commission approved intern program is one of the minimum requirements for issuance of university and district intern credentials and references the relevant EC subsection.

(d)(2): Bilingual authorization programs require accreditation by the Committee on Accreditation and approval by the Commission. In addition, EC §44253.4(b) states that a bilingual authorization program, “...may be completed at the same time as the initial preparation for the prerequisite credential or at a later date...” The bilingual authorization authorizes the same service as a CLAD Certificate/English learner authorization specified in EC §44253.3 and content instruction delivered in the pupil’s primary language and instruction for primary language development [reference EC §44253.4(a)]. Therefore, the proposed language in this subsection allows an intern teaching credential to be issued with a bilingual authorization if the program sponsor offers a Commission approved bilingual authorization program and requests the authorization at the time of recommendation pursuant to subsection (c)(8).

(e): Intern programs are joint programs of California employing agencies and approved program sponsors (reference Education Code §44321). The approved program sponsor in collaboration with the California employing agency design structured guidance and regular site-based support and supervision to include a structured sequence of supervised fieldwork. A California employing agency that elects to participate in an intern program must have a signed Memorandum of Understanding in place with the program sponsor prior to an intern teacher assuming daily teaching responsibilities. To ensure an intern teacher is employed by a California employing agency that has entered into an agreement with an approved intern program sponsor, an intern teaching credential is restricted to service with the California employing agency identified by the approved program sponsor at the time of recommendation [reference EC §44464 for university interns and 44830.3(a) for district interns].

(g)(2)(B): Proposed amendments to 5 CCR §80004 were in progress at OAL at the time the intern teaching credentials were initially proposed (reference OAL Notice File No. Z-2013-0416-07). The earlier amendments to 5 CCR §80004 were approved by OAL on August 12, 2013

(reference OAL Notice File No 2013-0802-04 S) and took effect on October 1, 2013. The earlier proposed amendments to 5 CCR §80004 added subsection (e) to clarify the authorization of the World Language: English Language Development (WL: ELD) content area available on Single Subject Teaching Credentials. The reference to subsection (e) was included in subsection (g)(2)(B) of the proposed intern regulations in anticipation of OAL's approval of the earlier proposed amendments to 5 CCR §80004.

Non-Substantive Modifications to the Proposed Regulation Text

The following non-substantive modifications have been made to the identified subsections of the proposed regulation text for the reasons stated:

(c)(6): The language originally proposed in this subsection could have possibly been misinterpreted to mean that the program standards detailing the intern preservice preparation were included in subsection (c)(5), rather than in the documents incorporated by reference. Therefore, the proposed language has been non-substantively modified to add “in the documents incorporated by” between “...program standards” and “...referenced in (c)(5).” In addition, the “d” has been deleted from the word “referenced” for grammatical purposes. The corrected sentence in the final proposed regulation text reads, “Completion of intern preservice preparation provided by a Commission approved program sponsor as detailed in the program standards in the documents incorporated by reference in (c)(5).”

(c)(7): The processing fee that must be submitted with each application packet is specified exclusively in subsection (a)(1) of 5 CCR §80487. The non-substantive modification to this subsection adds “(a)(1)” following “80487” to ensure clarity as related to the required processing fee.

Consideration of Alternatives

The Commission has determined that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Mandated Costs

These proposed regulations will not impose a mandate on local agencies or school districts that must be reimbursed in accordance with Part 7 (commencing with section 17500) of the Government Code.

Documents Incorporated by Reference:

Pursuant to 1 CCR §20(c)(1), the Commission requests that the three program standards documents not be printed in the code. The program standards documents include between 37 to 158 pages and publishing the incorporated documents would be cumbersome, unduly expensive, and otherwise impractical. The program standards are available on the Commission's website as follows:

Education Specialist Teaching and Other Related Services Credential Program Standards (rev. 5/13): <http://www.ctc.ca.gov/educator-prep/standards/Special-Education-Standards-2013.pdf>

SB 2042 Multiple Subject and Single Subject Preliminary Credential Program Standards (rev. 5/13): <http://www.ctc.ca.gov/educator-prep/standards/AdoptedPreparationStandards-2013.pdf>
Standards of Quality and Effectiveness for Programs Leading to Bilingual Authorization (rev. 1/13): <http://www.ctc.ca.gov/educator-prep/standards/Bilingual-Authorization-Handbook.pdf>

Updated Tally of Responses

The Commission received the following written responses to the public announcement during the 45-day comment period:

<i>Support</i>	<i>Opposition</i>
2 organizational opinions	1 organizational opinion
0 personal opinions	0 personal opinions
Total Written Responses: 3	

Written Responses Representing Organizations in Support:

1. Bill Lucia, President, edVoice
2. California Federation of Teachers, Californians for Justice, Californians Together, Disability Rights Education and Defense Fund, Public Advocates Inc., and RYSE Center

Written Responses Representing Individuals in Support: None.

Written Responses Representing Organizations in Opposition:

1. Eric Scroggins, Executive Vice President, California, Teach For America
Comments: We write to provide written comment on the Proposed Addition of 5 California Code of Regulations §80033 Pertaining to the Intern Teaching Credentials. We have appreciated the opportunity to partner with the Commission on Teacher Credentialing and the many stakeholders in this process to move toward regulations which ensure support for intern teachers, something which Teach For America believes to be critical and in which we have long been deeply invested and engaged. We additionally appreciate the focus paid to the needs of English Learners, as so many of our teachers are working with students who are English Learners and are deeply committed to the success of their EL students.

Overall, we believe that the proposed regulations reflect the consensus achieved by the Commission through a stakeholder engagement process sustained over several months. We laud the Commission's compromise-orientation and on-going revisions to ensure that the proposed regulations do not contradict the statutes which clearly authorize Intern Credential holders to teach English Learners. And, as we review the specifics of the proposed regulations, we believe that there are a few minor adjustments which would improve upon them, largely so as to ensure needed flexibility at the local level.

Under section 80033(b), relating to the support and supervision of intern teachers, we respectfully request and suggest language which would allow employing agencies and programs a greater level of discretion as they provide quality support and mentorship. We wholeheartedly agree that mentors need to meet high standards and be well-positioned to provide support to the new teachers who they mentor and support. Our experience suggests that a specific credential or even specific years of experience are not ideal filters through which one can determine who the best mentors will be, and, at the same time, we understand that there are not currently perfect alternate standards which will fit all situations and

contexts. We believe that those closest to the teachers and classrooms—namely the employing agencies and approved programs—should be empowered to make decisions regarding who, in their specific contexts, will be the most effective mentors for their intern teachers, and we believe the current proposed language is too narrow and unnecessarily restricts the ability of employing agencies and local programs to make these decisions.

Specifically, section (b)(3) currently reads: *“Prior to an intern teacher assuming daily teaching responsibilities, the California employing agency must identify a mentor for the intern teacher that possesses a valid, corresponding life or clear teaching credential and a minimum of three years of successful teaching experience,”* and we are concerned that this language excludes and does not envision some potentially excellent mentors for intern teachers, including former teachers who are now scholars related to new teacher support, as well as excellent practitioners who may have come from out of state, and we are additionally concerned that this proposed approach will place a burden on smaller rural and charter schools with small staffs, in particular. To strike a balance between the need for ensuring quality and also the need for flexibility at the school-level, we suggest the following alternative language *“Prior to an intern teacher assuming daily teaching responsibilities, the California employing agency must identify a mentor for the intern teacher ~~that who possesses a valid, corresponding life or clear teaching credential, and a minimum of three years of successful teaching experience~~ and who the employing agency deems to be an appropriate mentor.”* The spirit behind our suggested amended language is simply to allow a greater level of autonomy and responsibility at the level of the employing agency and the program, as these entities are the closest to their schools, classrooms, teachers and students, and are well-positioned to make good decisions in terms of designating appropriate mentors for their intern teachers.

Response: The word “corresponding” proposed in subsection (b)(3) as related to the credential that must be held by a mentor teacher is not intended to exclude potential mentors. One definition for “corresponding” is “having the same or nearly the same relationship” and the intent of the word in subsection (b)(3) is to ensure that a multiple subject intern teacher is mentored by the holder of a Multiple Subject Teaching Credential, a single subject intern teacher is mentored by the holder of a Single Subject Teaching Credential, or a special education intern teacher is mentored by the holder of a special education teaching credential. The proposed language in (b)(3) does not require that the mentor teacher hold a credential in the same content or specialty area as the intern teacher. The exact type of teaching credential that must be held by a mentor teacher will be specified in the Memorandum of Understanding developed between the employer and the program sponsor. Commission staff recommends the rejection of this suggested edit.

Deleting “life or clear” as related to the level of teaching credential that must be held by a mentor teacher will allow holders of preliminary teaching credentials to be assigned as mentor teachers. Such action could be problematic since the majority of preliminary teaching credentials require completion of an induction or Level II (for holders of Level I Education Specialist Instruction Credentials) credential program to qualify for the clear credential. (The only exception to completion of an induction or Level II program to qualify for a clear credential is for out-of-state prepared teachers with at least two years of out-of-state teaching experience.) It would be very difficult for the holder of a preliminary teaching credential to teach, complete an induction or Level II program, and mentor an intern teacher all at the same time. The renewal requirements associated with preliminary

teaching credentials are why the Administrative Services Credential regulations were recently amended to require possession of a life or clear credential prior to issuance of a Preliminary Administrative Services Credential. Commission staff recommends the rejection of this suggested edit.

Lastly, requiring a minimum of three years of successful teaching experience ensures that mentors assigned to intern teachers have a minimum level of classroom teaching experience. Replacing the three years of teaching experience requirement with “...and who the employing agency deems to be an appropriate mentor” would allow individuals with little to no teaching experience to be assigned as a mentor to an intern teacher who also has little to no teaching experience. Three years of teaching experience is consistent with other Title 5 sections that require employers to assign educators to guide and assist permit holders [reference 5 California Code of Regulations (CCR) §80026.5 pertaining to emergency permits and §§80027 and 80027.1 pertaining to limited assignment permits]. Commission staff recommends the rejection of this suggested edit.

Additionally, we request a technical correction in Section (g)(2)(B) and suggest that it be amended to account for the fact that there is no Section 8004(e) (sic), which means that the final clause would simply read “sections 8004(a) through (d)” rather than referencing sections 8004(a) though (sic) (e), as it currently does.

Response: Proposed amendments to 5 CCR §80004 were in progress at OAL at the time the intern teaching credentials were initially proposed. The earlier proposed amendments to 5 CCR §80004 were approved by OAL on August 12, 2013 (reference OAL Notice File No 2013-0802-04 S) and took effect on October 1, 2013. The earlier proposed amendments to 5 CCR §80004 added subsection (e) to clarify the authorization of the World Language: English Language Development (WL: ELD) content area. The reference to subsection (e) was included in subsection (g)(2)(B) of the proposed intern regulations (5 CCR §80033) in anticipation of OAL’s approval of the earlier proposed amendments to 5 CCR §80004. Commission staff recommends the rejection of this suggested edit due to the approval of the amendments to 5 CCR §80004 that added subsection (e).

Finally, we observe that while the disclosures regarding the proposed regulatory action indicate that there have been initial determinations made by the Commission that these proposed regulations are not likely to create a cost impact for a representative private person, we believe that it is entirely foreseeable that some intern programs will add significantly to their requirements as a result of these regulations, and that program costs will go up and be borne by participants in these programs and, ultimately, will negatively impact the diversity of the teaching force. As an organization that places enormous value on diversity in the teaching profession, we feel a particular responsibility to raise this issue, especially given the positive role that alternative pathway programs have had in California and across the nation’s increasingly diverse student body. Over 55% of our new teachers are either people of color or grew up in a low-income community, and we look forward to working with the Commission, our program partners and other stakeholders in this process to ensure that added requirements do not create financial constraints which may well have the unintended consequence of reducing the diversity of the teaching force.

Response: There are currently no 5 CCRs related to the issuance of intern teaching credentials. The purpose of the proposed addition of 5 CCR §80033 is to clarify, interpret, and make specific the Education Code sections related to intern teaching credentials. The proposed regulations do not add additional requirements for the issuance of intern teaching credentials. The cost impact concerns expressed above are ambiguous. However, if directed at the support/mentoring and supervision of intern teachers, this requirement has always been included in the intern credential program standards and is also required, but not specified, in statute. The proposed regulations simply set the minimum number of hours of support/mentoring and supervision that must be provided to an intern teacher each year. Although other issues outside the purview of the Commission may affect the costs associated with an intern teaching credential program, Commission staff does not anticipate that the proposed regulations will have a direct impact on the costs to be borne by intern program participants.

We thank the Commission and all the stakeholders in this process for their time and commitment to these issues. While the many groups and individuals involved in this work may, at times, hold different perspectives on specific issues or differ on specific language, and may, at time, also be coming from different experience bases in the teacher preparation field, it is clear that we all share an unwavering commitment to serving the needs of all of California's students. We look forward to ongoing collaboration and partnership with the Commission and the many stakeholders engaged in this critical work, and appreciate the opportunity to comment on the proposed regulations.

Written Responses Representing Individuals in Opposition: None.

Oral Comments Received During the Public Hearing:

1. Tara Kini, Senior Staff Attorney, Public Advocates

Ms. Kini voiced support of the proposed regulations on behalf of Public Advocates, Californians Together, the Disability Rights Education and Defense Fund, Californians for Justice, the RYSE Center, and the California Federation of Teachers. She also urged the Commission to take action to move the proposed regulations forward.

2. Eric Scroggins, Teach for America

Mr. Scroggins clarified that, although his letter submitted during the 45-day comment period was listed as "in opposition" in the Public Hearing Agenda Insert, Teach for America is very much in support of the proposed regulations.

He went on to point out the following two areas on which he felt discussion would be helpful:

- Concern that the credential requirement specified in 5 CCR §80033(b)(3) for the intern mentor would exclude individuals who are credentialed in other states.

Response: It is anticipated that the majority of individuals assigned by California employers to mentor intern teachers will hold teaching credentials issued by the Commission on Teacher Credentialing, as implied in staff's response to the letter received from Mr. Scroggins during the 45-day public comment period. However, the proposed language in 5 CCR §80033(b)(3) does not state that the "valid, corresponding life or clear teaching credential" must be issued by the Commission on Teacher

Credentialing. Intern program sponsors and employers will determine the exact type of teaching credential that must be held by a mentor teacher in the Memorandum of Understanding, including the potential acceptance of valid, corresponding life or clear teaching credentials issued by other states. The Commission adopted the proposed regulations with the understanding that “valid, corresponding life or clear teaching credential” could be broadly interpreted to include out-of-state teaching credentials if agreed upon in the Memorandum of Understanding developed between the intern program sponsor and the employer.

- Potential additional costs associated with the minimum support/mentoring and supervision hours specified in 5 CCR §80033(b)(4) that may be passed on to intern teachers.

Response: Support/mentoring and supervision of intern teachers is required by statute (reference Education Code §§44461 and 44465) and has always been included in the program standards for intern teaching credentials. However, neither statute nor the program standards state the minimum required hours of support/mentoring and supervision that must be provided to an intern teacher yearly. The current support/mentoring and supervision provided yearly to an intern teacher may be more or less than the 144 hours proposed in 5 CCR §80033(b)(4) for all intern teachers or the additional 45 hours proposed in 5 CCR §80033(b)(5) for intern teachers who enter the program without an English learner authorization.

Employing agencies participating in intern programs that do not currently provide support/mentoring and supervision at the minimum levels included in the proposed regulations may incur additional costs. However, employing agency participation in an intern program is voluntary. Employing agencies may opt out of the intern programs or reduce the number of yearly participants to offset any potential cost increases associated with the proposed yearly minimum support/mentoring and supervision hours.

15-day Notice Commission Consent Calendar Agenda Item

There were no oral comments received pertaining to the 15-day Notice at the December 12, 2013 Commission meeting. The 15-day Notice was approved by the Commission at the December 12, 2013 Commission meeting as part of the Consent Calendar.

15-day Notice Written Comments

The Commission received the following written responses to the 15-day notice from December 13, 2013 to December 27, 2013:

<i>Support</i>	<i>Opposition</i>
0 organizational opinions	0 organizational opinions
0 personal opinion	0 personal opinions

Total Written Responses to 15-Day Notice: 0

Grand Total of Responses: 5